

# ROBINSON, McFADDEN & MOORE, P.C.

ACCEPTED

Legal. 3-30-04

March 30, 2004

169861

VIA HAND DELIVERY

Jim DSE  
audit



ATTORNEYS AND COUNSELORS  
AT LAW

DAVID W. ROBINSON, II  
JOHN S. TAYLOR, JR.  
DANIEL T. BRAILSFORD  
FRANK R. ELLERBE, III  
THOMAS W. BUNCH, II  
J. KERSHAW SPONG  
D. CLAY ROBINSON  
R. WILLIAM METZGER, JR.\*\*  
KEVIN K. BELL  
ANNEMARIE B. MATHEWS †

BONNIE D. SHEALY  
CHARLES H. McDONALD  
MARGARET R. SCOOPMIRE  
ERIN A. COOK  
M. KEVIN GARRIS  
L. JEFFERS DAVIS, IV

\*\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law  
† Also Admitted in South Carolina

Mr. Bruce Duke  
Public Service Commission of South Carolina  
Synergy Business Park, Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: SCCTA / Universal Service Fund- 2003  
Case No. 1997-0239-C  
Our File No. 19336-0011

Dear Mr. Duke:

Enclosed for filing please on behalf of the South Carolina Cable  
Television Association please find the following:

1. Second Set of Interrogatories to BellSouth Telecommunications, Inc.;
2. Second Set of Interrogatories to ALLTEL South Carolina, Inc.;
3. Second Set of Interrogatories to PBT Telecom;
4. Second Set of Interrogatories to Horry Telephone Cooperative, Inc.;
5. Second Set of Interrogatories to Home Telephone Co., Inc.;
6. Second Set of Interrogatories to Hargray Telephone Co., Inc.; and
7. Second Set of Interrogatories to Bluffton Telephone Co., Inc.

By copy of this letter we are serving the same on Counsel for the above-referenced companies and other parties of record. Please date-stamp the extra copies provided as proof of filing and return them with our courier. If you have any questions, please have someone on your staff contact me.

Very truly yours,  
ROBINSON, McFADDEN & MOORE, P.C.

*Bonnie D. Shealy*  
Bonnie D. Shealy

/bds  
Enclosures  
cc/enc:

Ms. Nancy Horne  
John M. Bowen, Jr., Esquire (via hand delivery)  
Margaret M. Fox, Esquire (via hand delivery)  
Patrick W. Turner, Esquire (via hand delivery)  
Robert D. Coble, Esquire (via hand delivery)  
Parties of record (via U.S. Mail)



Founding Member

**Interrogatory No. 2** State the maximum amount of the USF funding approved for BELL SOUTH at the present time.

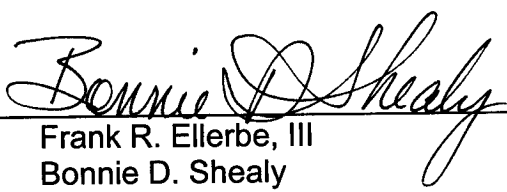
**Interrogatory No. 3**      How much explicit funding did BELLSOUTH receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

**Interrogatory No. 4**      How much implicit support did BELLSOUTH receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5**      List each telecommunications service that BELLSOUTH provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By:   
Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
)  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )


**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:52  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association 2nd Set of Interrogatories to BellSouth Telecommunications, Inc.** by hand delivery:

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
1600 Williams Street, Suite 5200  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
\_\_\_\_\_  
Lawrence Lackomy

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
 )  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )

---

**CERTIFICATE OF SERVICE**

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to BellSouth Telecommunications, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltel South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

RECEIVED  
2004 MAR 30 PM 5:22  
PUBLIC SERVICE  
COMMISSION

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DelltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

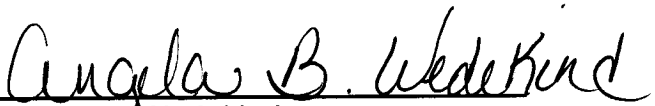
John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
P.O. Box 11390  
Columbia, SC 29211

Dated at Columbia, South Carolina this 30th day of March 04.

  
Angela B. Wedekind

RECEIVED  
3.31.04

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

DOCKET NO. 97-239-C

In Re:

Proceeding to Establish Guidelines for an  
Intrastate Universal Service Fund

)  
)  
)  
)  
)  
)

Second Set of  
Interrogatories  
To  
ALLTEL South Carolina,  
Inc.

SC PUBLIC SERVICE  
COMMISSION

2004 MAR 30 PM 3:22

RECEIVED

TO: ROBERT D. COBLE, ESQUIRE, attorney for ALLTEL South Carolina, Inc.

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. Section 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association ("SCCTA") requests ALLTEL South Carolina, Inc. ("ALLTEL") respond to the following written interrogatories within fifteen (15) days after service.

**Interrogatory No. 1:** State the maximum amount of the Universal Service Fund ("USF") funding approved for ALLTEL in 2000.

**Interrogatory No. 2** State the maximum amount of the USF funding approved for ALLTEL at the present time.



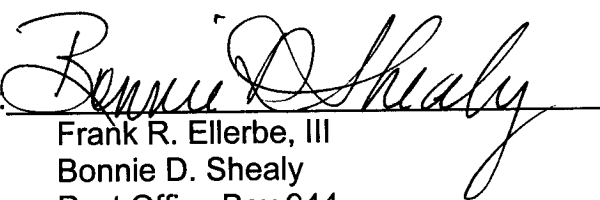
**Interrogatory No. 3** How much explicit funding did ALLTEL receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

**Interrogatory No. 4** How much implicit support did ALLTEL receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5** List each telecommunications service that ALLTEL provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By.   
Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
 )  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

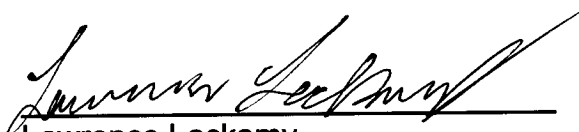
**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:26  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Alltel South Carolina, Inc.** by hand delivery:

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
1441 Main Street, Suite 1500  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
\_\_\_\_\_  
Lawrence Lackomy

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
)  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:22  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Alltel South Carolina, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltel South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DeltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

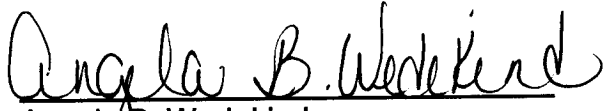
Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
P.O. Box 11390  
Columbia, SC 29211

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 30th day of March 04.

  
Angela B. Wedekind

FILED 6.31.04 BNA

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

DOCKET NO. 97-239-C

In Re: )  
)  
Proceeding to Establish Guidelines for an )  
Intrastate Universal Service Fund )  
)  
\_\_\_\_\_ )

Second Set of  
Interrogatories  
To  
PBT Telecom

SC PUBLIC SERVICE  
COMMISSION

2004 MAR 30 PM 3:18

RECEIVED

TO: John M. Bowen, Jr., Esquire, and Margaret M. Fox, Esquire, Attorneys for PBT  
Telecom

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. Section 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association ("SCCTA") requests PBT Telecom ("PBT") respond to the following written interrogatories within fifteen (15) days after service.

**Interrogatory No. 1:** State the maximum amount of the Universal Service Fund ("USF") funding approved for PBT in 2000.

**Interrogatory No. 2** State the maximum amount of the USF funding approved for PBT at the present time.

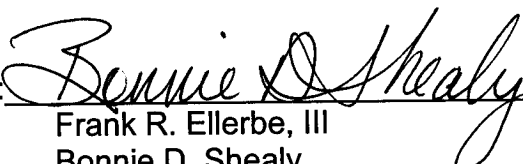
**Interrogatory No. 3**      How much explicit funding did PBT receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

**Interrogatory No. 4**      How much implicit support did PBT receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5**      List each telecommunications service that PBT provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By:   
Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
)  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:19  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to PBT Telecom** by hand delivery:

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
\_\_\_\_\_  
Lawrence Lackomy



**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

RECEIVED  
2004 MAR 30 PM 3:19  
SC PUBLIC SERVICE  
COMMISSION

In Re: )

Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to PBT Telecom** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltel South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DeltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211


John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 30<sup>th</sup> day of March 04.

  
Angela B. Wedekind

FILED 3.31.04 PM 4

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

DOCKET NO. 97-239-C

In Re:

Proceeding to Establish Guidelines for an  
Intrastate Universal Service Fund

)  
)  
)  
)  
)  
)

Second Set of  
Interrogatories  
To  
Horry Telephone  
Cooperative, Inc.

SC PUBLIC SERVICE  
COMMISSION

2004 MAR 30 PM 3:19

RECEIVED

TO: John M. Bowen, Jr., Esquire, and Margaret M. Fox, Esquire, Attorneys for Horry  
Cooperative, Inc.

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. Section 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association ("SCCTA") requests Horry Telephone Cooperative, Inc. ("Horry") respond to the following written interrogatories within fifteen (15) days after service.

**Interrogatory No. 1:** State the maximum amount of the Universal Service Fund ("USF") funding approved for Horry in 2000.

**Interrogatory No. 2** State the maximum amount of the USF funding approved for Horry at the present time.

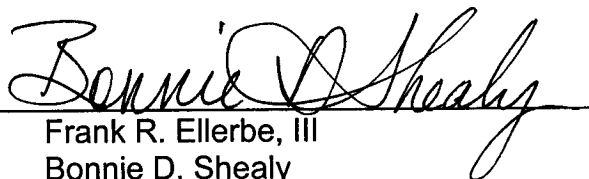
**Interrogatory No. 3**        How much explicit funding did Horry receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

**Interrogatory No. 4**        How much implicit support did Horry receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5**        List each telecommunications service that Home provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By:   
Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C

In Re: )  
 )  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

SC PUBLIC SERVICE  
COMMISSION

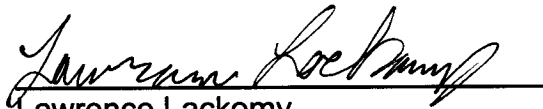
2004 MAR 30 PM 3:40

RECEIVED

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Horry Telephone Cooperative, Inc.** by hand delivery:

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
Lawrence Lackomy

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
 )  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:20  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Horry Telephone Cooperative, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltell South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DeltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211



John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 30th day of March 04.

  
Angela B. Wedekind

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 97-239-C**

**In Re:**

## Proceeding to Establish Guidelines for an Intrastate Universal Service Fund

**Second Set of  
Interrogatories  
To  
Home Telephone  
Company, Inc.**

SC PUBLIC WORKS  
COMMISION

2004 MAR 30 PM 3: 20

RECEIVED

TO: John M. Bowen, Jr., Esquire, and Margaret M. Fox, Esquire, Attorneys for Home Telephone Co., Inc.

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. Section 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association ("SCCTA") requests Home Telephone Co., Inc. ("Home") respond to the following written interrogatories within fifteen (15) days after service.

**Interrogatory No. 1:** State the maximum amount of the Universal Service Fund (“USF”) funding approved for Home in 2000.

**Interrogatory No. 2** State the maximum amount of the USF funding approved for Home at the present time.

**Interrogatory No. 3**      How much explicit funding did Home receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

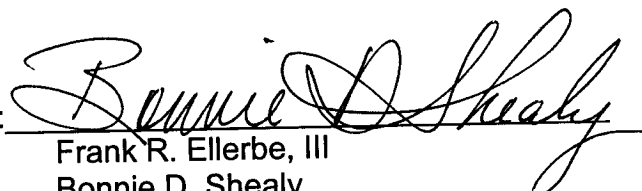
**Interrogatory No. 4**      How much implicit support did Home receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5**      List each telecommunications service that Home provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By: \_\_\_\_\_



Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C

In Re:

Proceeding to Establish Guidelines  
for an Intrastate Universal Service  
Fund

CERTIFICATE OF SERVICE

SC PUBLIC SERVICE  
COMMISSION

2004 MAR 30 PM 3:20

RECEIVED

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Home Telephone Company, Inc.** by hand delivery:

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
Lawrence Lackomy

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
)  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

RECEIVED  
2001 MAR 30 PM 3:20  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Home Telephone Company, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltel South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DeltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

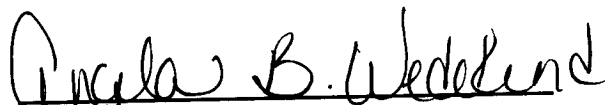
John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 30th day of March 04.

  
Angela B. Wedekind

POSTED  
3.31.04 RING

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

DOCKET NO. 97-239-C

In Re:

Proceeding to Establish Guidelines for an  
Intrastate Universal Service Fund

)  
)  
)  
)  
)  
)

Second Set of  
Interrogatories  
To  
Hargray Telephone  
Company, Inc.

SO PUBLIC SERVICE  
COMMISSION

2004 MAR 30 PM 3:21

RECEIVED

TO: John M. Bowen, Jr., Esquire, and Margaret M. Fox, Esquire, Attorneys for  
Hargray Telephone Co., Inc.

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. Section 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association ("SCCTA") requests Hargray Telephone Co., Inc. ("Hargray") respond to the following written interrogatories within fifteen (15) days after service.

**Interrogatory No. 1:** State the maximum amount of the Universal Service Fund ("USF") funding approved for Hargray in 2000.

**Interrogatory No. 2** State the maximum amount of the USF funding approved for Hargray at the present time.



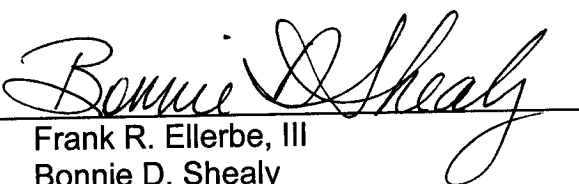
**Interrogatory No. 3**      How much explicit funding did Hargray receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

**Interrogatory No. 4**      How much implicit support did Hargray receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5**      List each telecommunications service that Hargray provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By:   
Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C

In Re: )  
 )  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

CERTIFICATE OF SERVICE

SC PUBLIC SERVICE  
COMMISSION

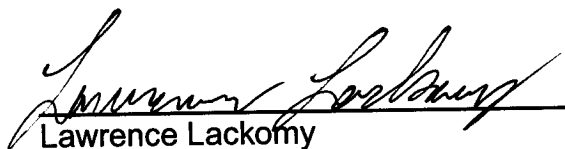
2004 MAR 30 PM 3:24

RECEIVED

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Hargray Telephone Company, Inc.** by hand delivery:

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
Lawrence Lackomy

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )  
)  
Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Hargray Telephone Company, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltell South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

RECEIVED  
2004 MAR 31 PM 3:22  
SC PUBLIC SERVICE  
COMMISSION

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DeltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 30th day of March 04.

  
Angela B. Wedekind

**DOCKET NO. 97-239-C**

**POSTED**  
3.31.04 *DN*

[illegible]

2004 MAR 30 PM 3:18

SC PUBLIC SAFETY  
COMMISSION

## Proceeding to Establish Guidelines for an Intrastate Universal Service Fund

**Second Set of  
Interrogatories  
To  
Bluffton Telephone  
Company, Inc.**

Pursuant to the South Carolina Rules of Civil Procedure, 26 S.C. Reg. Section 103-851, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina, the South Carolina Cable Television Association ("SCCTA") requests Bluffton Telephone Co., Inc. ("Bluffton") respond to the following written interrogatories within fifteen (15) days after service.

**Interrogatory No. 1:** State the maximum amount of the Universal Service Fund (“USF”) funding approved for Bluffton in 2000.

**Interrogatory No. 2** State the maximum amount of the USF funding approved for Bluffton at the present time.

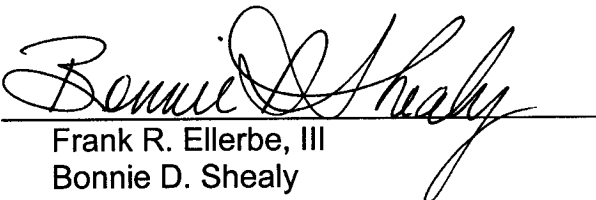
**Interrogatory No. 3**      How much explicit funding did Bluffton receive from the South Carolina USF and any other source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify the source.

**Interrogatory No. 4**      How much implicit support did Bluffton receive from any source for the years 2001, 2002, and 2003? State the amount received from each source by year and identify each source of implicit support.

**Interrogatory No. 5**      List each telecommunications service that Bluffton provided that generated implicit support for the years 2001, 2002, and 2003. For each such service state the amount of implicit support generated by such service by year.

Dated this 30 day of March, 2004.

ROBINSON, McFADDEN & MOORE, P.C.

By:   
Frank R. Ellerbe, III  
Bonnie D. Shealy  
Post Office Box 944  
Columbia, South Carolina 29202  
(803) 779-8900

Attorneys for South Carolina Cable Television  
Association

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )

Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

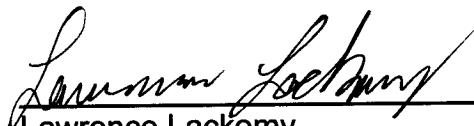
**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:18  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Lawrence Lackomy, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Bluffton Telephone Company, Inc.** by hand delivery:

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
1301 Gervais Street  
Columbia, SC 29201

Dated at Columbia, South Carolina this 30th day of March 04.

  
\_\_\_\_\_  
Lawrence Lackomy



**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 1997-0239-C**

In Re: )

Proceeding to Establish Guidelines )  
for an Intrastate Universal Service )  
Fund )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

RECEIVED  
2004 MAR 30 PM 3:18  
SC PUBLIC SERVICE  
COMMISSION

This is to certify that I, Angela B. Wedekind, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **South Carolina Cable Television Association Second Set of Interrogatories to Bluffton Telephone Company, Inc.** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Kay Berry  
Alltel South Carolina, Inc.  
2000 Center Pointe Drive, Suite 2400  
Columbia, SC 29210

Gene V. Coker, Esquire  
AT&T - Law & Government Affairs  
Suite 8100  
1200 Peachtree Street, NE  
Atlanta, GA 30309

Susan B. Berkowitz, Esquire  
SC Appleseed Legal Justice Center  
Post Office Box 7187  
Columbia, SC 29202

Martin H. Bocock, Jr.  
Sprint, Director-External Affairs SC Sprint  
1122 Lady Street, Suite 1050  
Columbia, SC 29201

Stan J. Bugner, State Director  
Verizon Select Services, Inc.,  
Suite 825 1301 Gervais Street  
Columbia, SC 29201

Craig K. Davis, Esquire  
1420 Hagood Avenue  
Columbia, SC 29205-1327

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, SC 29205

Nanette Edwards  
ITC DelltaCom Communications  
4092 S. Memorial Parkway  
Huntsville, AL 35802

Robert D. Coble, Esquire  
Nexsen Pruet Adams Kleemeier, LLC  
PO Drawer 2426  
Columbia, SC 29202

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
Post Office Box 1509  
Columbia, SC 29202

Steven W. Hamm, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A., P.O. Drawer  
7788  
Columbia, SC 29202-7788

Elliott F. Elam, Jr., Esquire  
South Carolina Department of Consumer Affairs  
Post Office Box 5757  
Columbia, SC 29250-5757

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte, LLC  
Post Office Box 11449  
Columbia, SC 29211

John M.S. Hoefer, Esquire  
Willoughby & Hoefer, P.A.  
Post Office Box 8416  
Columbia, SC 29202

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
P.O. Box 12399  
Columbia, SC 29211

John F. Beach, Esquire  
Ellis Lawhorne & Sims, P.A.  
P.O. Box 2285  
Columbia, SC 29202

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

Dated at Columbia, South Carolina this 30th day of March 04.

  
Angela B. Wedekind